L1630450056 – St. Clair Co.
Lefton Iron & Metal
ILD#984809244
SF/HRS

CERCLA

Expanded Site Inspection

Illinois Environmental
Protection Agency

CERCLA
EXPANDED SITE INSPECTION

for:

LEFTON IRON & METAL
East St. Louis, Illinois
ILB984809244
L0570250003

PREPARED BY:
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF LAND
DIVISION OF REMEDIATION MANAGEMENT
OFFICE OF SITE EVALUATION

September 6, 2005

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1.0 INTRODUCTION

On September 22, 2001, the Illinois Environmental Protection Agency's (IEPA) Office of Site Evaluation was tasked by Region V of the United States Environmental Protection Agency (U.S. EPA) to conduct a CERCLA Expanded Site Inspection (ESI) of Lefton Iron & Metal (ILD984809244) located in East St. Louis, Illinois. The ESI was performed under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) commonly known as Superfund.

Lefton Iron & Metal was initially placed on the Comprehensive Environmental Response, Compensation, and Liability Act Information System (CERCLIS) on July 4, 1991. This action was the result of the IEPA concern of potential release of hazardous waste to the population and the environment. Lefton Iron & Metal received its initial CERCLA evaluation in the form of a Preliminary Assessment (PA) conducted by the IEPA in September of 1992. In July of 2002, the IEPA's Office of Site Evaluation prepared and submitted an ESI work plan for Lefton Iron & Metal to the Region V offices of the U.S. EPA. The ESI sampling event was conducted on August 27 & 28, 2002.

The objective of an ESI is to collect all data necessary to prepare a Hazard Ranking System (HRS) scoring package to propose the site to the National Priorities List (NPL). To fully evaluate the site and fulfill HRS documentation requirements, the ESI should:

1) Investigate and document critical hypotheses or assumptions not completely tested during previous investigations

2) Collect samples to attribute hazardous substances to site operations
3) Collect samples to establish representative background levels
4) Collect any other missing HRS data for pathways of concern

2.0 SITE BACKGROUND

2.1 SITE DESCRIPTION

Lefton Iron & Metal Company was a metal reclamation and recycling business that was in operation from 1961 until 2001. The business was owned and operated by the brothers Mr. Norman and Mr. Benjamin Lefton. Site activities took place on two physically separate parcels of property separated by approximately two city blocks. The properties are referred to as the 17th Street facility and the Converse Avenue facility throughout the rest of the report. The 17th Street facility is approximately 3.4 acres while the Converse Avenue facility is approximately 2.9 acres in size.

Both properties are located in the northwest quarter of Section 19, Township 2 North, Range 10 West of the Third Principal Meridian, St. Clair County. The address given in CERCLIS for Lefton Iron & Metal is 205 South 17th Street. Refer to Figures 1 & 2 for a site specific location. A 4-mile radius map of the area surrounding the facilities can be found in Appendix A.

The site is located south of Interstate 55 in an urbanized area of East St. Louis, Illinois. The area around the 17th Street facility is primarily residential although not densely populated due to the fact that many of the properties are vacant, condemned, or uninhabitable. The area around the Converse Avenue facility is primarily residential with some industrial properties. The area around the Converse facility is also not densely populated for reasons similar to those of the 17th Street facility. Fox Warehouse is located directly northeast of the Converse facility. The Wastex Corporation, which was

the subject of an IEPA supervised voluntary remediation, is also situated northeast of the Converse facility.

2.2 SITE HISTORY

Records indicate that the 17th Street facility has been used for industrial purposes since at least 1905. A Sanborn Fire Insurance Map from 1905 indicates that the property was occupied by the Missouri Malleable Iron Company that operated as a metal foundry. A Sanborn Fire Insurance Map from 1938 indicates that the property at 17th Street had changed hands at least once during this time period and operated as a scrap yard under the title of Compressed Steel Corporation.

The same Sanborn Map from 1905 indicates that the area occupied by the Converse Avenue facility was zoned residential. The Sanborn Map for 1938 indicates the presence of the Steel Baling Company operating on a portion of the Converse Avenue property. The Steel Baling Company operated a scrap yard at the Converse Avenue property as well.

Lefton Iron & Metal began operations at the 17th Street facility in 1961. The 17th Street property was leased from Converse-Beerman Iron & Metal until 1974. In 1974 the Lefton's purchased the property and have owned it outright since. The Converse Avenue facility was purchased from the Steel Baling Company in 1974. Lefton Iron & Metal continued expansion of the Converse Avenue facility by purchasing the remaining residential lots located southeast of the property.

Lefton Iron & Metal was a wholesale scrap operation. Lefton purchased scrap metal in bulk and then separated unwanted items such as wood, paper, wires, and plastic from the metal. The scrap metal was either compacted or chopped, depending upon the grade of the metal, for resale. Some items, such as wheels from trains, were bought and sold as is. There is no indication that Lefton operated an incinerator at either property nor does it appear that scrap metal was shredded on-site.

2.3 PREVIOUS INVESTIGATIONS

On October 31, 1988 a complaint was received by the IEPA expressing concern over the dumping of waste oil and wire burning at Lefton Iron & Metal. The complaint concerned both facilities operated by Lefton. On November 16, 1988 the IEPA attempted to conduct an investigation in regard to complaints against the site. At that time access was denied to conduct the investigation. An agreement was reached between the IEPA and Lefton Iron & Metal to conduct the investigation in November of 1988.

On November 18, 1988 personnel from the IEPA contacted the complainant and discovered that Lefton Iron & Metal was removing soil and backfilling the area with rock. IEPA personnel then conducted an off-site reconnaissance of the 17th Street facility where they observed a loader removing soil and placing it in roll-off boxes. IEPA personnel then drove to the Converse Avenue facility to see if similar activities were taking place at that location. Upon arrival IEPA personnel observed Lefton trucks at the end of Brady Street, near the rear of the Converse facility. Upon closer inspection they

noted freshly dumped soil near the fence at the back of the Converse Avenue facility. IEPA personnel returned later in the day to conduct the complaint investigation. Upon arrival at the site, they immediately went to the area in which the dumping was observed earlier in the day. A total of four composite soil samples were taken from the piles.

Analysis of the samples revealed the soil to be contaminated with PCBs at levels greater than 50 parts per million. This ultimately resulted in the IEPA sealing two acres at the rear of the Converse Avenue facility. In 1989 the IEPA contracted an environmental consulting firm to conduct a remedial investigation of the site. In 1990 a referral was made to U.S. EPA Region V Toxic Substances Control Act Unit concerning possible response action regarding the contaminated soils at Lefton Iron & Metal. At that time it was determined that the Lefton site was not a high priority candidate for a Removal Action.

In 1993 the IEPA conducted a CERCLA Screening Site Inspection (SSI) at the Lefton site. The SSI revealed PCB and heavy metal contamination throughout both properties. The scope of sampling was fairly limited in that only shallow soil samples were collected. The Key Sample Summary from the 1993 SSI can be found in Appendix D. At that time a recommendation was made that the site be the subject of further CERCLA investigation.

In 2000 the IEPA OSE submitted a request to the U.S. EPA Emergency Response Branch that the Lefton Iron & Metal site be reconsidered for possible Emergency Removal

Action. In 2001 and 2002 the U.S. EPA Emergency Response Branch conducted an Emergency Removal Action at the Lefton Iron & Metal site based upon the IEPA request. A large volume of PCB and lead contaminated soil was removed at both properties as part of the U.S. EPA Removal Action. The focus of the 2002 ESI was to conduct a subsurface investigation in order to determine if any soil contamination persisted at depth on-site.

2.4 REGULATORY STATUS

Based upon available file information the Lefton Iron & Metal site does not appear to be subject to Resource Conservation and Recovery Act (RCRA) corrective action authorities. Information currently available does not indicate that the site is under the authority of the Atomic Energy Act (AEA), Uranium Mine Tailings Action (UMTRCA), or the Federal Insecticide Fungicide or Rodenticide Act (FIFRA).

3.0 EXPANDED SITE INSPECTION ACTIVITIES

3.1 SOIL SAMPLING

During the 2002 CERCLA Expanded Site Inspection IEPA personnel collected 40 soil samples in order to determine if previously identified contaminants persisted at the Lefton Iron & Metal facility. This sampling event was a follow-up effort to the U.S. EPA Removal Action. Figures 3 & 4 identify the location of the soil samples.

All of the samples were collected using the Geoprobe Macro Core® soil sampling device. Soil was transferred from the sampling device directly into sample containers supplied by the IEPA Bottle Shop. All IEPA collected soil samples are packaged and sealed in accordance with previously documented IEPA Bureau of Land procedures. The samples were analyzed for pesticides and PCBs by a CLP laboratory assigned by the U.S. EPA. The same samples were analyzed for inorganic constituents using Niton® x-ray fluorescence (XRF) technology. Photographs of these sample locations are provided in Appendix D. A copy of the laboratory analytical data package is provided in Appendix E.

IEPA standard operating procedures for equipment decontamination was conducted prior to the collection of all soil samples. These procedures, performed at the IEPA warehouse, include an initial steam cleaning of equipment (spoon, trowels, bucket and mud augers, extensions and handles, etc.), then scrubbing with a liquid Alconox solution, a hot tap water rinse, and a final distilled water rinse. All equipment is air dried, then wrapped and stored in aluminum foil for transport to the field. Field

decontamination procedures were followed on-site between each sample location.

3.2 ANALYTICAL RESULTS

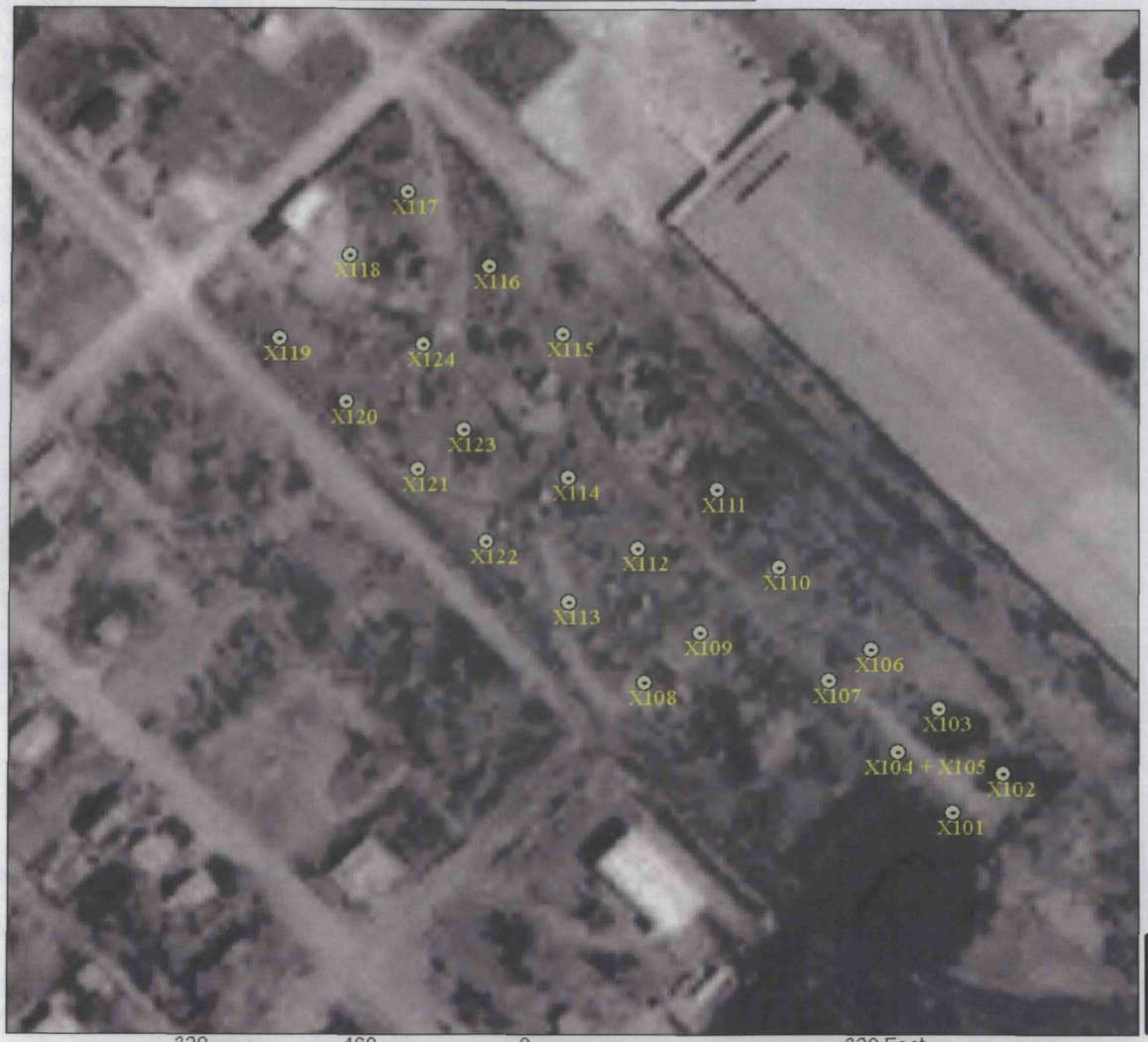
This section provides a summary of the analytical results of samples collected by the IEPA OSE during the 2002 ESI conducted at Lefton Iron & Metal in East St. Louis, Illinois. Laboratory analysis of the soil samples revealed on-site pesticide and polychlorinated biphenyl (PCB) contamination. Each Geoprobe® Macro-core location was also screened with a Niton® XRF for inorganic contamination at varying intervals. A total of 40 soil samples were collected during the 2002 ESI sampling event. Refer to Table 1 for a description of each sample. Tables 2, 3, & 4 contain the analytic results of each sample. Appendix E contains the complete validated laboratory data package.

Soil samples X101 thru X124 were collected at the Converse Avenue facility. Sample depths ranged from 2 feet below ground surface to 4.5 feet below ground surface. All of the samples were obtained using the Geoprobe Macro-core® system. This sampling method was chosen due to the fact that the property had been the subject of an U.S. EPA Emergency Removal Action. Contaminated soil had been removed and backfilled with clean material immediately prior to the 2002 ESI sampling event.

Soil samples X125 thru X140 were collected at the 17th Street facility. Sample depths ranged from 1.5 feet to 5 feet below ground surface. All of the samples were obtained using the Geoprobe Macro-core® system. This sampling method was chosen once again due to the fact that the property had been the subject of an U.S. EPA Emergency

Removal Action. Contaminated soil had been removed at depths up to 2 feet in some areas and backfilled with clean material immediately prior to the 2002 ESI sampling event.

Sample Location Map



N

Legend

⊙ Geoprobe Sample Locations

Lefton Iron & Metal
Converse Avenue Facility

Sample Location Map

N

Legend

⊙ Geoprobe Sample Locations

325 162.5 0 325 Feet

Lefton Iron & Metal
17th Street Facility

TABLE 1
SAMPLE DESCRIPTIONS

SAMPLE	DEPTH	APPEARANCE
X101	4'	Stained fill material
X102	4'	Stained clay
X103	4.5' - 5'	Dark brown clay
X104 X105	3' - 4'	Stained fill and dark brown clay
X106	4.5' - 5'	Stained brown clay
X107	4' - 4.5'	Stained fill material
X108	3' - 3.5'	Stained fill material
X109	2' - 2.5'	Stained fill material
X109A	3' - 3.5'	Stained fill material
X110	2' - 2.5'	Cinder type fill material
X110A	6' - 6.5'	Gray clay with product
X111	3.5' - 4.5'	Wet black fill material
X112	3.5' - 4'	Black clay with fill material
X113	3.5' - 4'	Stained clay
X114	3' - 3.5'	Cindery fill material
X115	3.5' - 4'	Cindery fill material

TABLE 1 (cont.)
SAMPLE DESCRIPTIONS

SAMPLE	DEPTH	APPEARANCE
X116	2.5' - 3.5'	Black cinder material
X116A	4' - 4.5'	Black cinder material
X117	3' - 3.5'	Black cinder material
X118	3' - 3.5'	Cindery fill material
X119	3' - 4'	Cinders and dark gray clay
X120	3.5' - 4'	Dark gray clay
X121	3' - 4'	Cinder material
X122	3' - 4'	Black cinder material
X123	3' - 4'	Cindery fill material to black clay
X124	3' - 4'	Cinder fill material to stained clay
X125	4' - 5'	Clayey fill material
X126	2.5' - 3'	Cinder fill material
X126A	3.5' - 4.5'	Stained brown clay with odor
X127	1.5' - 2'	Mixture of brown clay, cinder, and brick
X128	3.5' - 4.5'	Black cinder with brick
X128A	5.5' - 6'	Black cinder with brick

TABLE 1 (cont.)
SAMPLE DESCRIPTIONS

SAMPLE	DEPTH	APPEARANCE
X129	3.5' - 4'	Fill material with gray clay
X130	2' - 2.5'	Heavily stained fill material with product
X131	3' - 3.5'	Cindery fill material with clay
X132	4' - 5'	Stained fill material
X133	2.5' - 3'	Fill material
X134	3.5' - 5'	Cindery fill material
X135		
X136	2.5' - 3'	Cinder type fill material
X136A	4' - 4.5'	Gray clay with product
X137	2.5' - 3.5'	Cindery fill material
X137A	5' - 6'	Fill material with product
X138	3.5' - 4'	Cinder fill material
X139	4' - 4.5'	Fill material with product
X140	2' - 3'	Tan clay

TABLE 2
PESTICIDE/PCB SAMPLE SUMMARY
CONVERSE AVENUE FACILITY

Sample Point	X113	X101	X102	X103	X104	X105	X106	X107	X108	X109	X110	X111	X112
Depth	3.5' - 4'	4'	4'	4.5' - 5'	3' - 4'	3' - 4'	4.5' - 5'	4' - 4.5'	3' - 3.5'	2' - 2.5'	2' - 2.5'	3.5' - 4.5'	3.5' - 4'
Matrix	Soil (background)	Soil	Soil	Soil	Soil	Soil (duplicate)	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Pesticide/PCB (ppb)													
4,4'-DDT	4.2 UJ	--	--	11.0 J	--	--	--	30.0 J	--	--	--	--	--
gamma-BHC (Lindane)	2.2 U	--	--	2.3 J	--	--	--	--	--	--	--	2.5 J	--
Dieldrin	4.2 U	--	--	27.0 J	--	--	--	15.0 J	--	--	--	--	--
Endrin	4.2 U	--	--	--	--	--	--	21.0 J	--	--	--	--	--
4,4'-DDD	4.2 U	--	--	11.0 J	--	--	--	--	--	--	--	--	--
4,4'-DDE	4.2 U	--	--	12.0 J	--	--	--	5.7 J	--	--	--	2.6 J	--
Heptachlor	2.2 U	--	--	2.8 J	--	--	--	--	--	--	--	--	--
alpha-BHC	2.2 U	--	25.0 J	--	--	--	--	--	--	--	--	--	--
Endosulfan I	2.2 U	--	--	4.3 J	--	--	--	--	--	--	--	--	--
alpha-Chlordane	2.2 U	--	--	2.5 J	--	--	--	--	--	--	--	--	--
gamma-Chlordane	2.2 U	--	--	1.5 J	--	--	--	--	--	--	--	400.0	130.0
Aroclor-1260	42.0 U	26000.0	740.0	--	4700.0	2900.0	--	260.0	--	4900.0	3100.0	710.0	220.0
Aroclor-1248	42.0 U	17000.0	380.0	350.0	2000.0	3300.0	57.0	120.0	--	2100.0	1400.0	--	--

TABLE 2 (cont.)
PESTICIDE/PCB SAMPLE SUMMARY
17th STREET FACILITY

Sample Point	X132	X125	X126	X127	X128	X129	X130
Depth	4' - 5'	4' - 5'	2.5' - 3'	1.5' - 2'	3.5' - 4.5'	3.5' - 4'	2' - 2.5'
Matrix	Soil (background)	Soil	Soil	Soil	Soil	Soil	Soil
Pesticide/PCB (ppb)							
4,4'-DDT	3.6 UJ	--	26.0 J	--	250.0 J	--	1700.0 J
gamma-BHC (Lindane)	1.8 U	--	--	--	--	--	--
Dieldrin	3.6 U	--	--	--	11.0 J	--	--
Endrin	3.6 U	--	--	--	17.0 J	--	--
4,4'-DDD	3.6 UJ	--	20.0 J	--	200.0 J	--	--
4,4'-DDE	3.6 U	--	4.5 J	--	20.0 J	--	540.0 J
Heptachlor	1.8 U	--	2.5 J	--	--	--	350.0 J
Aldrin	1.8 U	--	--	--	--	--	--
beta-BHC	1.8 U	--	--	--	9.5 J	--	--
Heptachlor epoxide	1.8 U	--	--	--	7.7 J	--	--
alpha-Chlordane	1.8 U	--	--	--	--	--	--
gamma-Chlordane	1.8 U	--	2.3 J	--	--	--	--
Aroclor-1260	36.0 U	--	220.0	--	980.0	--	13000.0
Aroclor-1254	36.0 U	--	310.0	--	760.0	--	37000.0
Aroclor-1242	36.0 U	--	--	--	--	--	16000.0

TABLE 2 (cont.)
PESTICIDE/PCB SAMPLE SUMMARY
17th STREET FACILITY

Sample Point	X132	X131	X133	X134	X135	X136	X137	X138	X139	X140
Depth	4' - 5'	3' - 3.5'	2.5' - 3'	3.5' - 5'	3.5' - 5'	2.5' - 3'	2.5' - 3.5'	3.5' - 4'	4' - 4.5'	2' - 3'
Matrix	Soil (background)	Soil	Soil	Soil	Soil (duplicate)	Soil	Soil	Soil	Soil	Soil
Pesticide/PCB (ppb)										
4,4'-DDT	3.6 UJ	1200.0 J	1500.0 J	640.0 J	--	370.0 J	130.0 J	4.6 J	--	--
Endrin	3.6 U	--	--	--	330.0 J	--	--	--	--	96.0 J
4,4'-DDD	3.6 UJ	--	--	--	--	190.0 J	35.0 J	--	--	--
4,4'-DDE	3.6 U	310.0 J	370.0 J	--	--	140.0 J	46.0 J	--	--	28.0 J
Heptachlor	1.8 U	--	460.0 J	--	--	27.0 J	33.0 J	--	--	--
Aldrin	1.8 U	--	--	--	48.0	--	--	--	--	--
beta-BHC	1.8 U	--	--	--	--	--	42.0 J	--	--	--
Endosulfan I	1.8 U	--	--	--	--	--	19.0 J	--	--	--
Heptachlor epoxide	1.8 U	--	--	--	--	--	60.0 J	--	--	--
Endosulfan sulfate	3.6 U	--	--	--	--	--	34.0 J	--	--	--
alpha-Chlordane	1.8 U	--	--	--	--	32.0 J	--	--	--	--
gamma-Chlordane	1.8 U	--	--	--	--	42.0 J	--	--	--	--
Aroclor-1260	36.0 U	8400.0	12000.0	4700.0	4000.0	2900.0	--	--	--	1100.0
Aroclor-1254	36.0 U	24000.0	41000.0	9500.0	8500.0	--	3600.0	--	--	1800.0
Aroclor-1232	36.0 U	5300.0	--	--	--	--	--	--	--	--
Aroclor-1248	36.0 U		--	--	--	2300.0	2400.0	--	--	--
Aroclor-1242	36.0 U	--	20000.0	--	--	--	--	--	--	--

TABLE 3
KEY SAMPLE SUMMARY
CONVERSE AVENUE FACILITY

Sample Point	X113	X101	X102	X103	X104	X105	X106	X107	X109	X110	X111	X112
Depth	3.5' - 4'	4'	4'	4.5' - 5'	3' - 4'	3' - 4'	4.5' - 5'	4' - 4.5'	2' - 2.5'	2' - 2.5'	3.5' - 4.5'	3.5' - 4'
Matrix	Soil (background)	Soil	Soil	Soil	Soil	Soil (duplicate)	Soil	Soil	Soil	Soil	Soil	Soil
Pesticide/PCB (ppb)												
4,4'-DDT	4.2 UJ	--	--	--	--	--	--	30.0 J	--	--	--	--
Dieldrin	4.2 U	--	--	27.0 J	--	--	--	15.0 J	--	--	--	--
Endrin	4.2 U	--	--	--	--	--	--	21.0 J	--	--	--	--
4,4'-DDD	4.2 U	--	--	11.0 J	--	--	--	--	--	--	--	--
alpha-BHC	2.2 U	--	25.0 J	--	--	--	--	--	--	--	--	--
Aroclor-1260	42.0 U	26000.0	740.0	--	4700.0	2900.0	--	260.0	4900.0	3100.0	710.0	220.0
Aroclor-1248	42.0 U	17000.0	380.0	350.0	2000.0	3300.0	57.0	120.0	2100.0	1400.0	--	--

TABLE 3 (cont.)
KEY SAMPLE SUMMARY
CONVERSE AVENUE FACILITY

Sample Point	X113	X114	X115	X116	X117	X118	X120	X121	X122	X123	X124
Depth	3.5' - 4'	3'- 3.5'	3.5' - 4'	2.5' - 3.5'	3' - 3.5'	3' - 3.5'	3.5' - 4'	3' - 4'	3' - 4'	3' - 4'	3' - 4'
Matrix	Soil (background)	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Pesticide/PCB (ppb)											
4,4'-DDT	4.2 UJ	--	--	150.0 J	--	110.0 J	18.0 J	81.0 J	340.0 J	--	150.0
Dieldrin	4.2 U	--	--	--	--	--	--	17.0 J	--	--	28.0 J
Endrin	4.2 U	--	--	--	--	8.9 J	--	--	--	--	22.0 J
4,4'-DDD	4.2 U	--	--	--	22.0 J	55.0 J	--	87.0 J	59.0 J	--	--
4,4'-DDE	4.2 U	--	--	130.0 J	--	45.0 J	--	--	58.0 J	--	--
alpha-Chlordane	2.2 U	--	--	--	--	13.0 J	--	--	--	--	12.0 J
gamma-Chlordane	2.2 U	--	--	--	--	28.0 J	--	12.0 J	63.0 J	--	12.0 J
Aroclor-1260	42.0 U	7500.0	1000.0	990.0	--	680.0	120.0	560.0	2200.0	--	1300.0
Aroclor-1254	42.0 U	--	2100.0	1900.0	--	960.0	--	720.0	4900.0	160.0	1200.0
Aroclor-1248	42.0 U	1600.0	--	--	--	--	--	--	--	--	--

TABLE 3 (cont.)
KEY SAMPLE SUMMARY
17th STREET FACILITY

Sample Point	X132	X126	X128	X130
Depth	4' - 5'	2.5' - 3'	3.5' - 4.5'	2' - 2.5'
Matrix	Soil (background)	Soil	Soil	Soil
Pesticide/PCB (ppb)				
4,4'-DDT	3.6 UJ	26.0 J	250.0 J	1700.0 J
gamma-BHC (Lindane)	1.8 U	--	--	--
Dieldrin	3.6 U	--	11.0 J	--
Endrin	3.6 U	--	17.0 J	--
4,4'-DDD	3.6 UJ	20.0 J	200.0 J	--
4,4'-DDE	3.6 U	--	20.0 J	540.0 J
Heptachlor	1.8 U	--	--	350.0 J
Aldrin	1.8 U	--	--	--
beta-BHC	1.8 U	--	9.5 J	--
Heptachlor epoxide	1.8 U	--	7.7 J	--
Aroclor-1260	36.0 U	220.0	980.0	13000.0
Aroclor-1254	36.0 U	310.0	760.0	37000.0
Aroclor-1242	36.0 U	--	--	16000.0

TABLE 3 (cont.)
KEY SAMPLE SUMMARY
17th STREET FACILITY

Sample Point	X132	X131	X133	X134	X135	X136	X137	X140
Depth	4' - 5'	3' - 3.5'	2.5' - 3'	3.5' - 5'	3.5' - 5'	2.5' - 3'	2.5' - 3.5'	2' - 3'
Matrix	Soil (background)	Soil	Soil	Soil	Soil (duplicate)	Soil	Soil	Soil
Pesticide/PCB (ppb)								
4,4'-DDT	3.6 UJ	1200.0 J	1500.0 J	640.0 J	--	370.0 J	130.0 J	--
Endrin	3.6 U	--	--	--	330.0 J	--	--	96.0 J
4,4'-DDD	3.6 UJ	--	--	--	--	190.0 J	35.0 J	--
4,4'-DDE	3.6 U	310.0 J	370.0 J	--	--	140.0 J	46.0 J	28.0 J
Heptachlor	1.8 U	--	460.0 J	--	--	27.0 J	33.0 J	--
Aldrin	1.8 U	--	--	--	48.0	--	--	--
beta-BHC	1.8 U	--	--	--	--	--	42.0 J	--
Endosulfan I	1.8 U	--	--	--	--	--	19.0 J	--
Heptachlor epoxide	1.8 U	--	--	--	--	--	60.0 J	--
Endosulfan sulfate	3.6 U	--	--	--	--	--	34.0 J	--
alpha-Chlordane	1.8 U	--	--	--	--	32.0 J	--	--
gamma-Chlordane	1.8 U	--	--	--	--	42.0 J	--	--
Aroclor-1260	36.0 U	8400.0	12000.0	4700.0	4000.0	2900.0	--	1100.0
Aroclor-1254	36.0 U	24000.0	41000.0	9500.0	8500.0	--	3600.0	1800.0
Aroclor-1232	36.0 U	5300.0	--	--	--	--	--	--
Aroclor-1248	36.0 U		--	--	--	2300.0	2400.0	--
Aroclor-1242	36.0 U	--	20000.0	--	--	--	--	--

TABLE 4
XRF DATA

PROBE LOCATION	DEPTH	LEAD	SELENIUM	ARSENIC	MERCURY	ZINC	COPPER	NICKEL	COBALT	IRON	MANGANESE
X101	3'				3689.6		1109.6		284876.8		
	4'				7200.0		452.4		84582.4		
	5'				4960.0	1060.0	558.4	1249.6	150937.6		1899.2
X102	3'				23296.0	2760.0		2028.8	218931.2		2699 2
	4'				412.8				17497.6		
	5'				162.5				19788.8		
X103	5'		23.0		292.2				16396.8		393.8
	6'				192.1				27392.0		724.8
	7'				111.9				16192.0		
	8'				131.8				19891.2		
X104 & X105	3'				1109.6				45491.2		
	4'				221.4				13888.0		
	5'				169.4				16000.0		
X106	5'				159.1				12998.4		
	6'				132.9				16793.6		
	7'				114.4				18291.2		
X107	3'				1089.6				54169.6		
	4'				238.6				19289.6		
	5'							506.8	17088.0		
X108	3'				526.0				190976.0		2148.8
	4'				169.1				17792.0		
	5'				90.8				17190.4		
	6'				107.4				18790.4		
X109	3'				3369.6				72294.4		
	4'				299.2				24588.8		1009.6
	5'				158.6				15091.2		
X110	2'				3798.4	528.0			88064.0		1329.6
	3'				590.8				19596.8		766.4
	4'								55756.8		
	5'		45.5		195.8				14796.8	1960.0	
	6'				101.2				14899.2		
X111	3'				14592.0		1120.0		159948.8		2489.6
	4'				587.6				36889.6		
	5'				180.2				21388.8		
	6'				143.4				20390.4		
	7'				144.6				22592.0		
X112	3'				652.4				107929.6		
	4'				136.5				23692.8		
	5'				85.4				18291.2		652.4
X113	4'				76.0				11795.2		
	5'				165.0				16998.4		
X114	3'				13888.0				325836.8		4768.0
	4'				85.4				2388.8		
	5'				127.3		282.2		16896.0		
X115	3'				2289.6				75776.0		
	4'				11200.0				618905.6		5219.2
	5'				284.0				22489.6		
X116	3'				3497.6				118988.8		2040.0
	4'				146.7				71577.6		1109.6
	5'				192.0				24000.0	1920.0	
	6'				412.8				45798.4	2360.0	
X117	2'				2840.0				164966.4		
	3'				120.2				13888.0		
X118	3'				1520.0	715.2			86374.4		1200.0
	4'				108.0				19596.8		
	5'				215.8				20889.6		
X119	3'				96.3				13696.0		
	4'				125.9				17792.0		
X120	3'		153.9		5708.8				200908.8		2219.2
	4'				857.6				18995.2		
	5'				95.3				13491.2		
X121	3'				2329.6				206950.4		2268.8
	4'				3897.6			5158.4	488652.8		
	5'				114.3				17088.0		

TABLE 4 (cont.)
XRF DATA

PROBE LOCATION	DEPTH	LEAD	SELENIUM	ARSENIC	MERCURY	ZINC	COPPER	NICKEL	COBALT	IRON	MANGANESE
X122	4'				19494.4			5459.2	391987.2		3939.2
	5'				595.2				31897.6		
X123	3'				859.2		544.0		74854.4		
	4'				190.0		254.6		18688.0		507.6
	5'				130.1				14796.8		
X124	3'				9664.0				562790.4		6000.0
	4'				753.2				58163.2		824.8
	5'				125.2				14400.0		
X125	5'				375.8				78694.4		1440.0
	6'				1899.2				54374.4		
	7'				455.2				51788.8	3000.0	
	8'				135.8				17996.8		
X126	3'								16294.4		
	4'								10195.2		
	5'								13593.6		
X127	2'								10694.4		
	3'								8518.4		
	4'				108.7				13196.8		
X128	3'				2899.2	548.8			238796.8		
	4'				1409.6				135987.2	5939.2	
	5'				948.0				16998.4		
	6'				540.8				20800.0		
	7'				343.6				16588.8		
X129	3'				294.6				442777.6		
	4'				126.2				17996.8		
X131	3'				2360.0				46387.2		
	4'				268.6				15193.6		
X132	3'				1819.2		720.0		78489.6		
	4'				91.3				36275.2		691.2
	5'				95.1				60057.6		
	6'								8806.4		
X133	3'				12499.2		899.2		89856.0		1908.8
	4'				1680.0	575.6			40780.8		1129.6
X134 & X135	3'				418.4				7436.8		
	4'				120.1			657.6	29491.2		
X136	2'				742.8				139980.8	21593.6	
	3'				8505.6	1800.0			81868.8	4099.2	
	4'				2019.2				48896.0		
	5'				176.6				12499.2		
	6'				85.4				12499.2		
X137	2'				383.6		748.4		93593.6		
	3'								76083.2	6988.8	
	4'								103987.2		
	5'				77.8				17689.6		
	6'				161.0				12697.6		
X138	2'				3897.6	981.6			142950.4		
	3'				603.6				6739.2		
	4'								21094.4		
	5'				124.4				44492.8		
	6'							1149.6	83097.6		
X139	2'				557 2				156979.2		
	3'								106905.6		
	4'				127.8				72550.4		
X140	2'				4169.6				65792.0		
	3'				94.7				17088.0		
	4'								9164.8		

4.0 SITE SOURCES

This section includes descriptions of the various hazardous waste sources that were identified at the Lefton Iron & Metal site during the 2002 CERCLA Expanded Site Inspection. The Hazard Ranking System (HRS) defines a "source" as: "Any area where a hazardous substance has been stored, disposed or placed, plus those soils that have become contaminated from migration of hazardous substances." This does not include surface water or sediments that may have become contaminated.

Information obtained during the 2002 ESI identified two separate areas of contaminated soil as potential sources associated with the Lefton Iron & Metal site. As additional information becomes available, the possibility exists that additional sources of contamination may be identified.

4.1 CONTAMINATED SOIL - (17th Street)

An area of contaminated soil at the 17th Street facility was identified during the 2002 ESI of the Lefton Iron & Metal site. During the field sampling event it was noted by the sampling team that a large part of the 17th Street facility is composed of fill material. This was especially true in the northern section of the 17th Street facility where most of the scrap was stacked in large piles. Metal fluff from the scrap piles generally settled out onto the ground. Metal fluff material can be defined as "residual light fraction of shredder residue that may contain fibrous textiles, polyurethane foam, plastics, rubber, and a wide variety of light metals. This material may be saturated with lubricants and miscellaneous dirt and stone." When scrap was moved for cutting, compaction, or

selling, the fluff that had settled out of the waste piles was generally leveled to grade.

Laboratory analysis of samples collected at the 17th Street property revealed PCB contamination at concentrations that meet HRS criteria for an observed release. An area of contaminated soil between sample points X126, X128, X133, X136, X137, and X140 was delineated. The total area of contaminated soil was delineated using global positioning system (GPS) data. The total area of contaminated soil was estimated to encompass approximately 58,500 square feet. It is possible that soil contamination extends to areas of the site outside of which samples were collected.

4.3 CONTAMINTED SOIL - (Converse Avenue)

A separate area of contaminated soil was identified at the Converse Avenue property during the 2002 ESI of the Lefton Iron & Metal site. IEPA Bureau of Land file information indicates that this property had been slowly filled over a number of years in order to level it. Bureau of Land file information documents the fact that Lefton employees used fluff material/soil that had settled out of the scrap piles at the 17th Street facility for fill material at the Converse Avenue facility.

Samples collected during the 2002 ESI revealed that the Converse Avenue property is composed almost exclusively of fill material. The fill material was composed of various soil types, metal shavings, and other material such as saw dust and gravel. A portion of the Converse property has been designated a wetland according to U.S. Department of the Interior "Wetland Inventory" maps. A wetland map can be found in Appendix E.

The area of contaminated soil also includes a large portion of the designated wetland area located on the Converse Avenue property. This is the area in which PCB contaminated soil has been dumped in the past.

An area of contaminated soil was delineated between sample points X102, X115, X118, and X122. These sample locations exhibited contaminant concentrations that meet HRS criteria for an observed release. Analytic results of the samples collected at the Converse Avenue facility revealed elevated PCB concentrations. The total area of contaminated soil was delineated using global positioning system (GPS) data and determined to encompass approximately 71,220 square feet.

5.0 MIGRATION PATHWAYS

The IEPA Office of Site Evaluation identifies three migration pathways and one exposure pathway, as identified in the CERCLA Hazard Ranking System, by which hazardous substances may pose a threat to human health and/or the environment. Consequently, sites are evaluated on their known or potential impact to these pathways. The pathways evaluated are groundwater migration, surface water migration, soil exposure, and air migration.

5.1 GROUNDWATER

Groundwater samples were not collected during the 2002 ESI sampling event. The vast majority of residents in the City of East St. Louis and other area communities receive potable water from surface water intakes located on the Mississippi River. There are no public drinking water wells located within a four-mile radius of the site. An industrial well was located at the Fox Warehouse located immediately northeast of the Converse Avenue facility.

According to the *American Bottoms Groundwater Study* and the *St. Clair County Soil Survey*, this particular area of St. Clair County is primarily composed of two soil types. According to the available documents the upper strata consists of clayey silt with fine sand. As the 2002 ESI demonstrated, the properties are actually composed of fill material and disturbed soil in the uppermost strata. The lower section consists of medium to coarse sand and gravel and is glacial outwash. This outwash is five to 200 feet thick and contains the aquifer of concern in this area. Recharge of this aquifer is from

precipitation and surface water infiltration. Groundwater flow in the area is believed to be towards the Mississippi River located west of the site.

5.2 SURFACE WATER

Neither surface water nor sediment samples were collected during the 2002 ESI sampling event of Lefton Iron & Metal. This was due to the fact there is neither an intermittent nor a perennial waterway adjacent to either property. The nearest perennial waterway is the Mississippi River located approximately 1.5 miles west of the site.

Site run off enters directly into storm sewers at the 17th Street facility. It is difficult to ascertain where run off from the Converse Avenue facility drains. It is slightly raised due to the filling in of the property over the years when compare to the surrounding area. It is probable that run off leaves the property in a variety of directions.

Soil samples collected in the wetland area on the Converse Avenue facility revealed the presence of PCB and inorganic contamination. All of the soil samples were compared to background and summarized in Table 2. Contaminants that meet the HRS criteria for an observed release are summarized in Table 3.

5.3 AIR ROUTE

Other than ambient air monitoring with a Foxboro® Toxic Vapor Analyzer (TVA), samples were not collected during the 2002 ESI. Although an incinerator was never in operation at the site, a release via the air pathway is probable given the fact that open

burning was documented on-site. During the 1993 SSI the IEPA sampling team observed a pile of metal fluff type material smoldering at the Converse Avenue facility.

During the 1993 SSI the inspection team also noted a Lefton Iron & Metal employee burning an unidentified material off of scrap metal with a blowtorch. Some area residents had also complained of open burning taking place at the site. Scrap metal was constantly moved around and disturbed materials/soil in those areas could have led to airborne particulates.

Estimated Air Target Populations

On a source	**0**
0 to 1/4 mile	**1,640**
1/4 to 1/2 mile	**3,330**
1/2 to 1 mile	**9,935**
1 to 2 miles	**21,800**
2 to 3 miles	**27,595**
3 to 4 miles	**24,080**

According to U.S. Dept. of the Interior "National Wetland Inventory Maps" nearly half of the Converse Avenue facility is located on a designated wetland area. There are also approximately 20 acres of designated wetland areas within 1/2 mile of the site. As stated earlier in this report Lefton Iron & Metal filled an area identified as a wetland on the Converse Avenue property. Samples collected from the wetland area revealed elevated PCB and inorganic contamination.

5.4 SOIL EXPOSURE

40 soil samples were collected during the 2002 ESI of the Lefton Iron & Metal site. Laboratory analysis revealed a release of contaminants to nearby residences that may be attributable to the site. PCB and inorganic contamination were found at elevated

concentrations in soil samples collected at both the 17th Street and Converse Avenue facilities.

Area population was figured using a 2.76 person per household average for St. Clair

Estimated Soil Target Populations

On a source	**0**
0 to 1/4 mile	**1,640**
1/4 to 1/2 mile	**3,330**
1/2 to 1 mile	**9,935**

County. No designated terrestrial sensitive environments are located nearby. Access to both properties is restricted by chain link fence. Both properties were sealed as part of the 2001-2002 U.S. EPA Removal Action. There is, however, a high incidence of trespassing at both properties. Access to the area where the contaminated soil was found outside of the Converse Avenue facility has essentially unrestricted access.

As discussed in the Section 5.2, soil samples collected in the wetland area on the Converse Avenue facility revealed the presence of PCB and inorganic contamination. All of the soil samples were compared to background and summarized in Table 2. Contaminants that meet the HRS criteria for an observed release are summarized in Table 3.

6.0 REFERENCES

Bureau of the Census, County and City Data Book, 1990 U.S. Census data.

Illinois Environmental Protection Agency, Bureau of Land, file for Lefton Iron & Metal Company.

Lefton, Norman & Benjamin, Owners of Lefton Iron & Metal, April 6, 13, & 14, personal interviews.

Lutz, Richard W., Illinois Department of Conservation, Division of Planning, Impact Analysis Section Supervisor, August 13, 1992 correspondence.

Sanborn Map Company, Insurance Maps of East St. Louis, Illinois, Volume 1, 1905 & 1938.

United States Army Corps of Engineers, American Bottoms Groundwater Study, Water Resources Investigation St. Louis Metropolitan Area, Missouri and Illinois, August, 1979.

United States Department of Agriculture, Soil Survey of St. Clair County, Illinois, Illinois Agricultural Experiment Station, October, 1978.

United States Department of the Interior, National Wetlands Inventory Maps, 1988.

United States Geological Survey, 1974, Monks Mound, Illinois, 7.5 Minute Topographic Map.

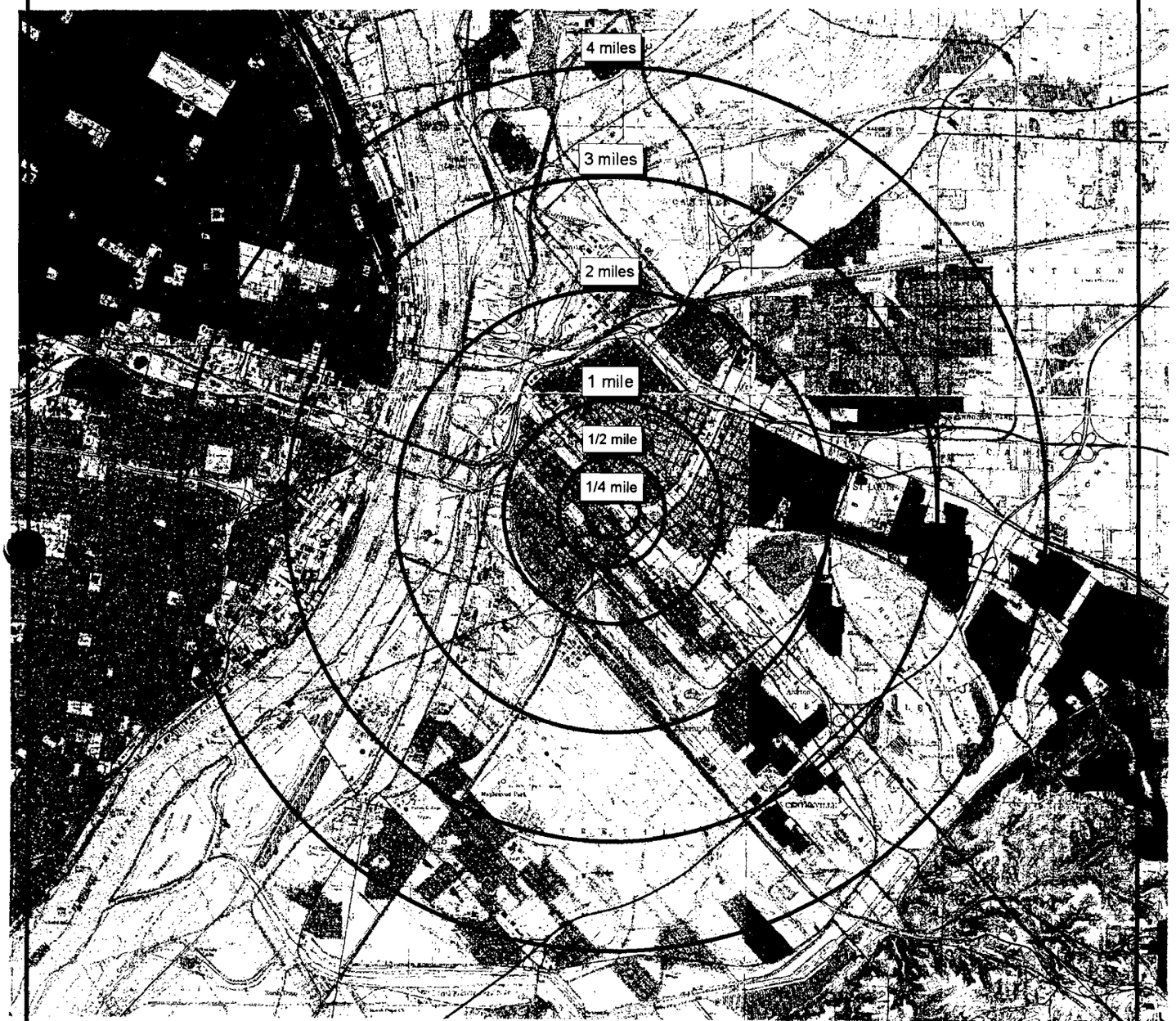
United States Geological Survey, 1982, Granite City, Illinois-Missouri, 7.5 Minute Topographic Map.

United States Geological Survey, 1974, Cahokia, Illinois- Missouri, 7.5 Minute Topographic Map.

United States Geological Survey, 1982, French Village, Illinois, 7.5 Minute Topographic Map.

APPENDIX A
4-Mile Radius Map

Appendix A
4-Mile Radius Map



3 0 3 Miles

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APPENDIX B
Target Compound List

TARGET COMPOUND LIST

Volatile Target Compounds

Chloromethane	1,2-Dichloropropane
Bromomethane	cis-1,3-Dichloropropene
Vinyl Chlorde	Trichloroethene
Chloroethane	Dibromochloromethane
Methylene Chloride	1,1,2-Trichloroethane
Acetone	Benzene
Carbon Disulfide	trans-1,3-Dichloropropene
1,1-Dichloroethene	Bromoform
1,1-Dichloroethane	4-Methyl-2-pentanone
1,2-Dichloroehtene (total)	2-Hexanone
Chloroform	Tetrachloroethene
1,2-Dichloroethane	1,1,2,2-Tetrachloroethane
2-Butanone	Toluene
1,1,1-Trichloroethane	Chlorobenzene
Carbon Tetrachloride	Ethylbenzene
Vinyl Acetate	Styrene
Bromodichloromethane	Xylenes (total)

Base/Neutral Target Compounds

Hexachloroethane	2,4-Dinitrotoluene
bis(2-Chloroethyl) Ether	Diethylphthalate
Benzyl Alcohol	N-Nitrosodiphenylamine
bis (2-Chloroisopropyl) Ether	Hexachlorobenzene
N-Nitroso-Di-n-Propylamine	Phenanthrene
Nitrobenzene	4-Bromophenyl-phenylether
Hexachlorobutadiene	Anthracene
2-Methylnaphthalene	Di-n-Butylphthalate
1,2,4-Trichlorobenzene	Fluoranthene

Isophorone	Pyrene
Naphthalene	Butylbenzylphthalate
4-Chloroaniline	bis(2-Ethylhexyl)Phthalate
bis(2-chloroethoxy)Methane	Chrysene
Hexachlorocyclopentadiene	Benzo(a)Anthracene
2-Chloronaphthalene	3-3'-Dichlorobenzidene
2-Nitroaniline	Di-n-Octyl Phthalate
Acenaphthylene	Benzo(b)Fluoranthene
3-Nitroaniline	Benzo(k)Fluoranthene
Acenaphthene	Benzo(a)Pyrene
Dibenzofuran	Ideno(1,2,3-cd)Pyrene
Dimethyl Phthalate	Dibenz(a,h)Anthracene
2,6-Dinitrotoluene	Benzo(g,h,i)Perylene
Fluorene	1,2-Dichlorobenzene
4-Nitroaniline	1,3-Dichlorobenzene
4-Chlorophenyl-phenylether	1,4-Dichlorobenzene

Acid Target Compounds

Benzoic Acid	2,4,6-Trichlorophenol
Phenol	2,4,5-Trichlorophenol
2-Chlorophenol	4-Chloro-3-methylphenol
2-Nitrophenol	2,4-Dinitrophenol
2-Methylphenol	2-Methyl-4,6-dinitrophenol
2,4-Dimethylphenol	Pentachlorophenol
4-Methylphenol	4-Nitrophenol
2,4-Dichlorophenol	

Pesticide/PCB Target Compounds

alpha-BHC	Endrin Ketone
beta-BHC	Endosulfan Sulfate
delta-BHC	Methoxychlor
gamma-BHC (Lindane)	alpha-Chlordane
Heptachlor	gamma-Chlordane
Aldrin	Toxaphene
Heptachlor epoxide	Aroclor-1016
Endosulfan I	Aroclor-1221
4,4'-DDE	Aroclor-1232
Dieldrin	Aroclor-1242
Endrin	Aroclor-1248
4,4'-DDD	Aroclor-1254
Endosulfan II	Aroclor-1260
4,4'-DDT	

Inorganic Target Compounds

Aluminum	Manganese
Antimony	Mercury
Arsenic	Nickel
Barium	Potassium
Beryllium	Selenium
Cadmium	Silver
Calcium	Sodium
Chromium	Thallium
Cobolt	Vanadium
Copper	Zinc
Iron	Cyanide
Lead	Sulfide
Magnesium	

APPENDIX C
IEPA Photographs

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1015
PHOTO BY: M. Weber
PHOTO NUMBER: 1
DIRECTION: East
COMMENTS: Photo of soil sample X101. X101 was collected near the main entrance to the Converse Avenue facility.

DATE: August 27, 2002
TIME: 1050
PHOTO BY: M. Weber
PHOTO NUMBER: 2
DIRECTION: East
COMMENTS: Photo of soil sample X102. X102 was collected near the main entrance to the Converse Avenue facility.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1110
PHOTO BY: M. Weber
PHOTO NUMBER: 3
DIRECTION: North
COMMENTS: Photograph of soil sample X103. X103 was collected in an area that was used at the Converse Avenue facility to accumulate scrap materials.

DATE: August 27, 2002
TIME: 1120
PHOTO BY: M. Weber
PHOTO NUMBER: 4
DIRECTION: East
COMMENTS: Photograph of duplicate soil samples X104 & X105. X104 & X105 were collected in them main scrap [illegible]d area of the Converse Avenue facility.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1145
PHOTO BY: M. Weber
PHOTO NUMBER: 5
DIRECTION: North
COMMENTS: Photo of soil sample X106. X106 was collected from the main scrap yard area of the Converse Avenue facility.

DATE: August 27, 2002
TIME: 1155
PHOTO BY: M. Weber
PHOTO NUMBER: 6
DIRECTION: East
COMMENTS: Photo of soil sample X107. X107 was collected from the main scrap yard area of the Converse Avenue facility.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1315
PHOTO BY: M. Weber
PHOTO NUMBER: 7
DIRECTION: South
COMMENTS: Photo of soil sample X108. X108 was collected near the southwestern edge of the Converse Avenue facility.

DATE: August 27, 2002
TIME: 1330
PHOTO BY: M. Weber
PHOTO NUMBER: 8
DIRECTION: East
COMMENTS: Photo of soil samples X109 & X109A. The samples were collected in the main scrap yard area of the Converse Avenue facility.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

DATE: August 27, 2002

TIME: 1340

PHOTO BY: M. Weber

PHOTO NUMBER: 9

DIRECTION: East

COMMENTS: Photograph of soil samples X110 &X110A. The samples were collected from the main scrap yard area of the Converse Avenue facility.

DATE: August 27, 2002

TIME: 1400

PHOTO BY: M. Weber

PHOTO NUMBER: 10

DIRECTION: North

COMMENTS: Photograph of soil sample X111. X111 was collected along the northwestern edge of the Converse Avenue facility.

SITE NAME: Lefton Iron & Metal
CERCLIS ID: ILD984809244 **COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1420
PHOTO BY: M. Weber
PHOTO NUMBER: 11
DIRECTION: East
COMMENTS: Photo of soil sample X112. X112 was collected from the Converse Avenue facility. The time displayed on the photo board is incorrect.

DATE: August 27, 2002
TIME: 1435
PHOTO BY: M. Weber
PHOTO NUMBER: 12
DIRECTION: East
COMMENTS: Photograph of soil sample X113. X113 was collected from the main scrap yard area of the Converse Avenue facility.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1450
PHOTO BY: M. Weber
PHOTO NUMBER: 13
DIRECTION: North
COMMENTS: Photograph of soil sample X114. X114 was from a central location of the Converse Avenue facility.

DATE: August 27, 2002
TIME: 1500
PHOTO BY: M. Weber
PHOTO NUMBER: 14
DIRECTION: West
COMMENTS: Photograph of soil sample X115. X115 was collected along the northeastern boundary of the Converse Avenue facility.

SITE NAME: Lefton Iron & Metal
CERCLIS ID: ILD984809244 **COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1535
PHOTO BY: M. Weber
PHOTO NUMBER: 15
DIRECTION: West
COMMENTS: Photograph of soil samples X116 & X116A. The samples were collected near the northeast corner of the Converse Avenue facility.

DATE: August 27, 2002
TIME: 1540
PHOTO BY: M. Weber
PHOTO NUMBER: 16
DIRECTION: North
COMMENTS: Photograph of soil sample X117. X117 was collected from the northeast corner of the Converse Avenue scrap yard facility. The sample number is improperly indicated on the photo board as X116.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1555
PHOTO BY: M. Weber
PHOTO NUMBER: 17
DIRECTION: West
COMMENTS: Photograph of soil sample X118. X118 was collected in the north central portion of the Converse Avenue facility.

DATE: August 27, 2002
TIME: 1605
PHOTO BY: M. Weber
PHOTO NUMBER: 18
DIRECTION: South
COMMENTS: Photograph of soil sample X119. X119 was collected in the northwestern corner of the Converse Avenue facility.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1625
PHOTO BY: M. Weber
PHOTO NUMBER: 19
DIRECTION: West
COMMENTS: Photograph unavailable.

DATE: August 27, 2002
TIME: 1640
PHOTO BY: M. Weber
PHOTO NUMBER: 20
DIRECTION: South
COMMENTS: Photograph of soil sample X121. X121 was collected from the central portion of the Converse Avenue main scrap yard area.

SITE NAME: Lefton Iron & Metal
CERCLIS ID: ILD984809244 **COUNTY:** St. Clair

DATE: August 27, 2002
TIME: 1650
PHOTO BY: M. Weber
PHOTO NUMBER: 21
DIRECTION: South
COMMENTS: Photograph of soil sample X122. X122 was collected from the central portion of the Converse Avenue main scrap yard area.

DATE: August 27, 2002
TIME: 1710
PHOTO BY: M. Weber
PHOTO NUMBER: 22
DIRECTION: East
COMMENTS: Photograph of soil sample X123. X123 was collected from the main scrap yard area of the Converse Avenue facility.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

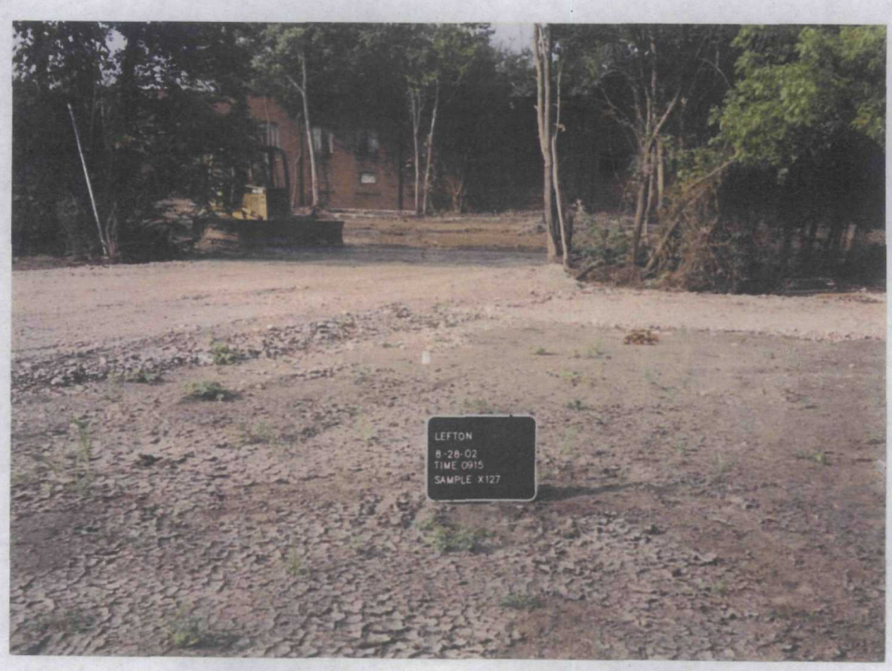
DATE: August 27, 2002
TIME: 1725
PHOTO BY: M. Weber
PHOTO NUMBER: 23
DIRECTION: Unknown
COMMENTS: Photograph of soil sample X124. X124 was collected from the main scrap yard area of the Converse Avenue facility.

DATE: August 28, 2002
TIME: 0850
PHOTO BY: M. Weber
PHOTO NUMBER: 24
DIRECTION: North
COMMENTS: Photograph of soil sample X125. X125 was collected from the northeast corner of the 17th Street facility.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

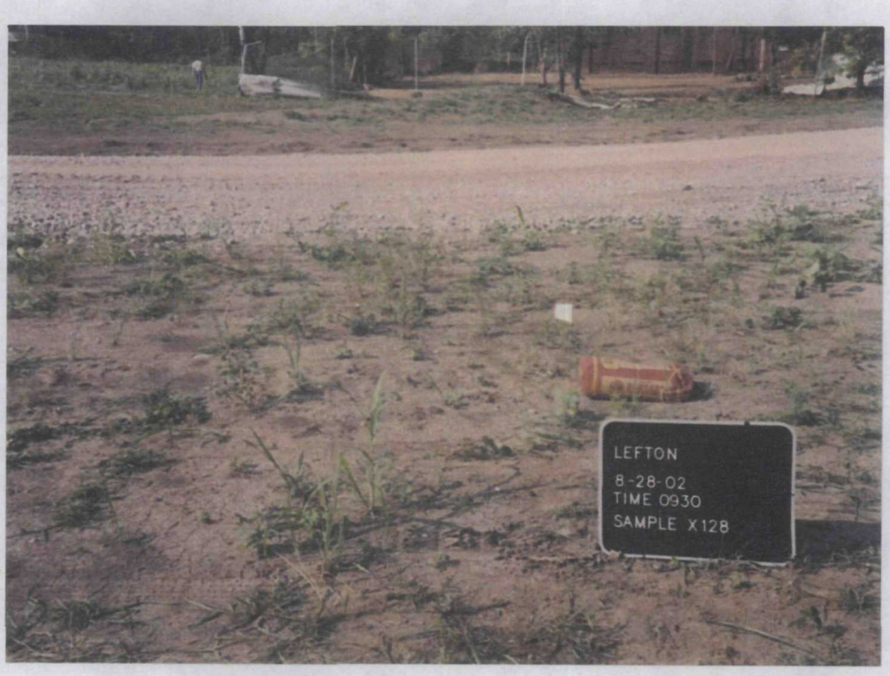
DATE: August 28, 2002
TIME: 0905
PHOTO BY: M. Weber
PHOTO NUMBER: 25
DIRECTION: North
COMMENTS: Photo of soil samples X126 & X126A. The samples were collected near the northern property line of the 17th Street facility.

DATE: August 28, 2002
TIME: 0915
PHOTO BY: M. Weber
PHOTO NUMBER: 26
DIRECTION: North
COMMENTS: Photograph of soil sample X127. X127 was collected in the north central area of the main scrap yard at the 17th Street facility.



SITE NAME: Lefton Iron & Metal
CERCLIS ID: ILD984809244 **COUNTY:** St. Clair

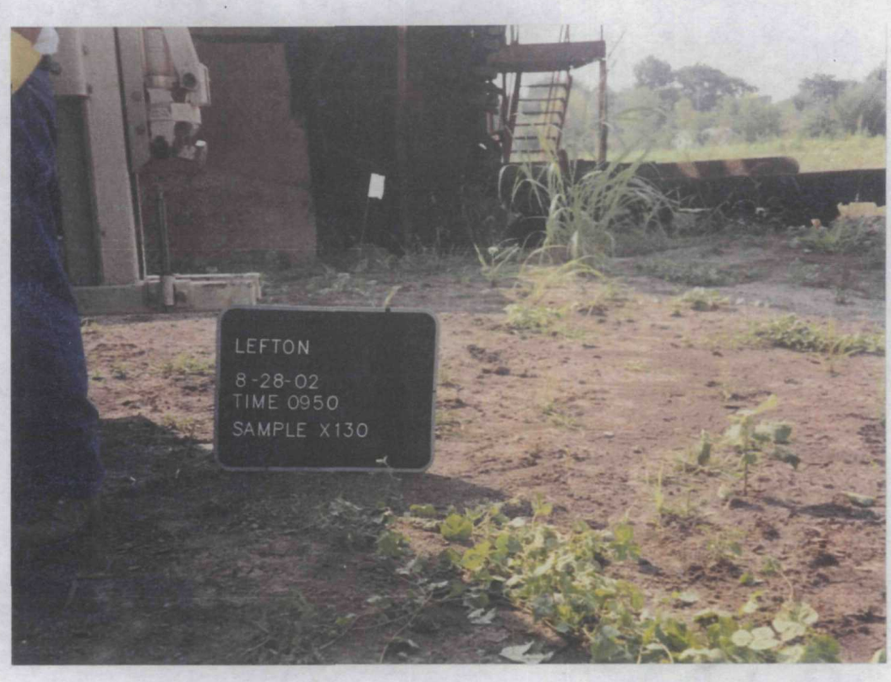
DATE: August 28, 2002
TIME: 0930
PHOTO BY: M. Weber
PHOTO NUMBER: 27
DIRECTION: South
COMMENTS: Photograph of soil samples X128 & X128A. The samples were collected near northeastern corner of the 17th Street facility.



DATE: August 28, 2002
TIME: 0945
PHOTO BY: M. Weber
PHOTO NUMBER: 28
DIRECTION: South
COMMENTS: Photograph of soil sample X129. X129 was collected from the central area of the main scrap yard at the 17th Street facility.

SITE NAME: Lefton Iron & Metal
CERCLIS ID: ILD984809244 **COUNTY:** St. Clair

DATE: August 28, 2002
TIME: 0950
PHOTO BY: M. Weber
PHOTO NUMBER: 29
DIRECTION: East
COMMENTS: Photograph of soil sample X130. X130 was collected from the main scrap yard area of the 17th Street facility. One of the on-site structures can be seen in the background.



DATE: August 28, 2002
TIME: 1005
PHOTO BY: M. Weber
PHOTO NUMBER: 30
DIRECTION: North
COMMENTS: Photograph of soil sample X131. X131 was collected from the main scrap yard area of the 17th Street facility.

SITE NAME: Lefton Iron & Metal
CERCLIS ID: ILD984809244 **COUNTY:** St. Clair

DATE: August 28, 2002
TIME: 1025
PHOTO BY: M. Weber
PHOTO NUMBER: 31
DIRECTION: North
COMMENTS: Photograph of soil sample X132. X132 was collected from an area on the 17th Street facility where a former rail spur was located.

DATE: August 28, 2002
TIME: 1045
PHOTO BY: M. Weber
PHOTO NUMBER: 32
DIRECTION: East
COMMENTS: Photograph of soil sample X133. X133 was collected from the main scrap yard area of the 17th Street facility.

SITE NAME: Lefton Iron & Metal	
CERCLIS ID: ILD984809244	**COUNTY:** St. Clair

DATE: August 28, 2002
TIME: 1100
PHOTO BY: M. Weber
PHOTO NUMBER: 33
DIRECTION: East
COMMENTS: Photograph of duplicate soil samples X134 & X135. The samples were collected from an area just north of the main offices at the 17th Street facility.

DATE: August 28, 2002
TIME: 1120
PHOTO BY: M. Weber
PHOTO NUMBER: 34
DIRECTION: North
COMMENTS: Photograph of soil samples X136 & X136A. The samples were collected on the 17th Street facility. The samples were collected along the northern property line.

SITE NAME: Lefton Iron & Metal
CERCLIS ID: ILD984809244 **COUNTY:** St. Clair

DATE: August 28, 2002
TIME: 1140
PHOTO BY: M. Weber
PHOTO NUMBER: 35
DIRECTION: East
COMMENTS: Photograph of soil samples X137 & X137A. The samples were collected from the main scrap yard area of the 17th Street facility.

DATE: August 28, 2002
TIME: 1155
PHOTO BY: M. Weber
PHOTO NUMBER: 36
DIRECTION: East
COMMENTS: Photograph of soil sample X138. X138 was collected from the main scrap yard area of the 17th Street facility.

SITE NAME: Lefton Iron & Metal

CERCLIS ID: ILD984809244 **COUNTY:** St. Clair

DATE: August 28, 2002

TIME: 1205

PHOTO BY: M. Weber

PHOTO NUMBER: 37

DIRECTION: East

COMMENTS: Photo of soil sample X139. X139 was collected from a location from which a rail spur entered the 17th Street facility.

DATE: August 28, 2002

TIME: 1215

PHOTO BY: M. Weber

PHOTO NUMBER: 38

DIRECTION: East

COMMENTS: Photograph of soil sample X140. X140 was collected from the southwest corner of the 17th Street facility.